

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

**COURTNEY FONTENOT, NATURAL  
TUTRIX FOR RYLAN GUILLORY, MINOR  
AND CASON GUILLORY, MINOR AND  
MONICA FONTENOT, INDIVIDUALLY  
AND AS REPRESENTATIVE OF THE  
ESTATE OF DEJUAN GUILLORY,**

**VERSUS** : **CIVIL ACTION NO.: 6:17-CV-01639-  
RGJ-PJH**

**HOLDEN PAUL LAFLEUR, AND  
EDDIE SOILEAU, INDIVIDUALLY  
AND IN HIS CAPACITY AS SHERIFF  
OF EVANGELINE PARISH**

---

**ANSWER TO COMPLAINT FOR DAMAGES UNDER 42 USC 1983,  
WRONGFUL DEATH AND SURVIVAL ACTIONS UNDER STATE LAW**

---

**NOW INTO COURT**, through undersigned counsel, comes defendant, **HOLDEN PAUL LAFLEUR AND EDDIE SOILEAU, INDIVIDUALLY AND IN HIS CAPACITY AS SHERIFF OF EVANGELINE PARISH** who in answer to Complaint for Damages Under 42 USC 1983, Wrongful Death and Survival Actions Under State Law filed by plaintiffs, **COURTNEY FONTENOT, NATURAL TUTRIX FOR RYLAN GUILLORY, MINOR AND CAYSON GUILLORY, MINOR AND MONICA FONTENOT, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF DEJUAN GUILLORY**, answer as follows:

1.

The allegations in paragraph one (1) are denied.

2.

The allegations in paragraph two (2) are denied.

3.

The allegations in paragraph three (3) are denied.

4.

The allegations in paragraph four (4) are denied.

5.

The allegations in paragraph five (5) are denied.

6.

The allegations in paragraph six (6) are denied.

7.

The allegations in paragraph seven (7) are denied.

8.

The allegations in paragraph eight (8) are denied.

9.

The allegations in paragraph nine (9) are denied.

10.

The allegations in paragraph ten (10) are denied.

11.

The allegations in paragraph eleven (11) are denied.

12.

The allegations in paragraph twelve (12) are denied.

13.

The allegations in paragraph thirteen (13) are denied.

14.

The allegations in paragraph fourteen (14) are denied.

15.

The allegations in paragraph fifteen (15) are denied.

16.

The allegations in paragraph sixteen (16) are denied.

17.

The allegations in paragraph seventeen (17) are denied.

18.

The allegations in paragraph eighteen (18) are denied.

19.

The allegations in paragraph nineteen (19) are denied.

20.

The allegations in paragraph twenty (20) are denied.

21.

The allegations in paragraph twenty-one (21) are denied.

22.

The allegations in paragraph twenty-two (22) are denied.

23.

The allegations in paragraph twenty-three (23) are denied.

24.

The allegations in paragraph twenty-four (24) are denied.

25.

The allegations in paragraph twenty-five (25) are denied.

26.

The allegations in paragraph twenty-six (26) are denied.

27.

The allegations in paragraph twenty-seven (27) are denied.

28.

The allegations in paragraph twenty-eight (28) are denied.

29.

The allegations in paragraph twenty-nine (29) are denied.

30.

The allegations in paragraph thirty (30) are denied.

31.

The allegations in paragraph thirty-one (31) are denied.

32.

The allegations in paragraph thirty-two (32) are denied.

33.

The allegations in paragraph thirty-three (33) are denied.

34.

The allegations in paragraph thirty-four (34) are denied.

35.

The allegations in paragraph thirty-five (35) are denied.

36.

The allegations in paragraph thirty-six (36) are denied.

37.

The allegations in paragraph thirty-seven (37) are denied.

38.

The allegations in paragraph thirty-eight (38) are denied.

39.

The allegations in paragraph thirty-nine (39) are denied.

40.

The allegations in paragraph forty (40) are denied.

41.

The allegations in paragraph forty-one (41) are denied.

42.

The allegations in paragraph forty-two (42) are denied.

43.

The allegations in paragraph forty-three (43) are denied.

44.

The allegations in paragraph forty-four (44) are denied.

45.

The allegations in paragraph forty-five (45) are denied.

46.

The allegations in paragraph forty-six (46) are denied.

47.

The allegations in paragraph forty-seven (47) are denied.

48.

The allegations in paragraph forty-eight (48) are denied.

49.

The allegations in paragraph forty-nine (49) are denied.

50.

The allegations in paragraph fifty (50) are denied.

51.

The allegations in paragraph fifty-one (51) are denied.

52.

The allegations in paragraph fifty-two (52) are denied.

53.

The allegations in paragraph fifty-three (53) are denied.

54.

The allegations in paragraph fifty-four (54) are denied.

55.

The allegations in paragraph fifty-five (55) are denied.

56.

The allegations in paragraph fifty-six (56) are denied.

57.

The allegations in paragraph fifty-seven (57) are denied.

58.

The allegations in paragraph fifty-eight (58) are denied.

59.

The allegations in paragraph fifty-nine (59) are denied.

60.

The allegations in paragraph sixty (60) are denied.

61.

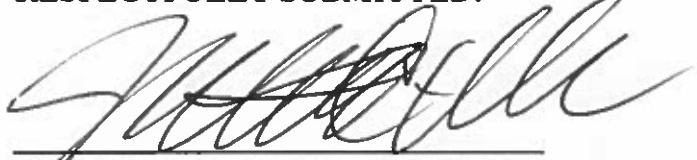
The allegations in paragraph sixty-one (61) are denied.

**WHEREFORE, HOLDEN PAUL LAFLEUR AND EDDIE SOILEAU, INDIVIDUALLY AND IN HIS CAPACITY AS SHERIFF OF EVANGELINE PARISH** pray that their answer to Plaintiff's Complaint for Damages Under 42 USC 1983, Wrongful Death and Survival Actions Under State Law be deemed good and sufficient and that after due proceedings are had that there be judgment in favor of **HOLDEN PAUL LAFLEUR AND EDDIE SOILEAU, INDIVIDUALLY AND IN HIS CAPACITY AS SHERIFF OF EVANGELINE PARISH**, and against **COURTNEY FONTENOT, NATURAL TUTRIX FOR RYLAN GUILLORY, MINOR AND CAYSON GUILLORY, MINOR AND MONICA FONTENOT, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF DEJUAN GUILLORY**, and that all of plaintiff's, **COURTNEY FONTENOT, NATURAL TUTRIX FOR RYLAN GUILLORY, MINOR AND CAYSON GUILLORY, MINOR AND MONICA FONTENOT, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF DEJUAN GUILLORY**, claims be dismissed with prejudice in favor of

**HOLDEN PAUL LAFLEUR AND EDDIE SOILEAU, INDIVIDUALLY AND IN HIS CAPACITY AS SHERIFF OF EVANGELINE PARISH, and for all costs to be paid by said plaintiff's.**

**HOLDEN PAUL LAFLEUR AND EDDIE SOILEAU, INDIVIDUALLY AND IN HIS CAPACITY AS SHERIFF OF EVANGELINE PARISH** finally pray for all just, general and equitable relief in the premises, including expert fees, expenses and counsel costs.

**RESPECTFULLY SUBMITTED:**



JONATHAN C. VIDRINE (#19197)  
510 WEST MAGNOLIA STREET  
POST OFFICE DRAWER 1019  
VILLE PLATTE, LOUISIANA 70586  
Ph. (337) 363-2772  
Fax (337) 363-2798  
Attorney for Holden Lafleur Lafleur and  
Eddie Soileau, Individually And in his  
capacity as Sheriff of Evangeline

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 6, 2018, a copy of the foregoing Answer to Complaint for Damages Under 42 USC 1983, Wrongful Death and Survival Actions Under State Law was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.



JONATHAN C. VIDRINE